

Biosolids Expert Panel
Richmond, VA

October 23, 2007

Dear Panel Members:

As a representative of a thirty-seven county coalition here in Virginia on the Sewage Sludge Issue, I would like to express the collected concerns of the citizens of the Commonwealth. We feel that developing meaningful **Health and Exposure Studies** is of the **utmost importance** and hope it is at the top of the panels list.

After reading the letters from two of the panelists that were sent in to the panel members, I feel it is necessary to state once again that the constituents in land applied sludge have long since been proven to be so complex and so unpredictable that a reliable health risk assessment of land applied sludge based solely on trying to identify contaminants in sludge, without considering interactions of chemicals and the effect of breakdown products will never be possible.

A study's hypothesis states that it is the irritant chemicals in sludge (which include lime) that make some sludge-exposed people more susceptible to infections. This hypothesis has never been refuted in any peer reviewed study. This has been the only meaningful exposure study done and published in a peer reviewed journal. (Lewis, Gattie and others)

We firmly believe what is needed in our communities are **Health Surveys and Exposure Studies**. This will alert us to citizen illnesses ahead of time so that land application buffers can be modified or other protective management practices can be put in place, including land application bans.

We urge you to heed the recommendation of the 2002 National Academy of Sciences Panel in "Biosolids Applied to Land" that what is urgently needed is Health Studies of Sludge-Exposed Neighbors.

In conclusion it is not **ANECDOTAL** when you are the affected person that never had a health problem before sludge was applied. It is not **ANECDOTAL** when your family physician of years states that their patients health has deteriorated due to the applications of sludge and that their patients **DID NOT** have any of these symptoms prior to these applications. Last but not least the majority of citizens feel that the burden of proof should be on the **Industry** and not on us, that they need to **PROVE** it safe before they apply it on our healthy lands!

Thank you for your consideration,

Mary H. Carwile, Chair
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